

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

SIERRA CLUB,

Plaintiff,

v.

Civil Action No. 2:15-cv-112-RAJ-DEM

VIRGINIA ELECTRIC AND POWER
COMPANY d/b/a DOMINION VIRGINIA
POWER,

Defendant.

**DEFENDANT VIRGINIA ELECTRIC AND POWER COMPANY'S
MOTION TO STAY PENDING RESOLUTION OF INTERLOCUTORY APPEAL**

Defendant Virginia Electric and Power Company d/b/a Dominion Virginia Power (“Dominion”) has sought interlocutory appeal of two questions decided in the Court’s November 6, 2015 Memorandum Opinion & Order [Doc. No. 21] (“Order”) denying Dominion’s Motion to Dismiss. Dominion respectfully moves for a stay of all district court proceedings pending resolution of any appeal. The grounds for this motion are more fully set forth in Dominion’s Memorandum in Support of Motion to Stay, which is filed herewith.

Dominion has met and conferred with counsel for the Plaintiff, and Plaintiff has advised that it will oppose this motion

VIRGINIA ELECTRIC AND POWER COMPANY
D/B/A DOMINION VIRGINIA POWER

By: /s/ Dabney J. Carr
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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December, 2015, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which then will send automatic notification of such filing (NEF) to the following:

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